#### FOLEY & LARDNER LLP

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Attorneys for Shanghai Inteva Automotive Door Systems Company, Ltd.

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:	)	Chapter 11
	)	
DPH HOLDINGS CORP., et al.,	)	Case No. 05-44481 (RDD)
	)	
Reorganized Debtors.	)	(Jointly Administered)
	)	

SHANGHAI INTEVA AUTOMOTIVE DOOR SYSTEMS COMPANY, LTD.'S RESPONSE TO REORGANIZED DEBTORS' FORTY-FIFTH OMNIBUS OBJECTION PURSUANT TO 11 U.S.C. § 503(B) AND FED. R. BANKR. P. 3007 TO (I) EXPUNGE CERTAIN ADMINISTRATIVE EXPENSE (A) SEVERANCE CLAIMS, (B) BOOKS AND RECORDS CLAIMS, (C) DUPLICATE CLAIMS, (D) PENSION AND BENEFIT CLAIMS, AND (E) TRANSFERRED WORKERS' COMPENSATION CLAIMS, (II) MODIFY AND ALLOW CERTAIN ADMINISTRATIVE EXPENSE SEVERANCE CLAIMS, AND (III) ALLOW CERTAIN ADMINISTRATIVE EXPENSE SEVERANCE CLAIMS, AND (III) ALLOW CERTAIN ADMINISTRATIVE EXPENSE SEVERANCE

Shanghai Inteva Automotive Door Systems Company, Ltd. ("<u>SDADS</u>" f/k/a Shanghai Delphi Automotive Door Systems), by and through its attorneys, Foley & Lardner LLP, files this Response (the "<u>Response</u>")<sup>1</sup> to the above-captioned Reorganized Debtors' Forty-Fifth Omnibus Objection Pursuant to 11 U.S.C. § 503(b) and Fed. R. Bankr. P. 3007 to (I) Expunge Certain Administrative Expense (A) Severance Claims, (B) Books and Records

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<sup>&</sup>lt;sup>1</sup> On January 13, 2010, SDADS filed a nearly identical response to the Reorganized Debtors Forty-First Omnibus Objection Pursuant to 11 U.S.C. § 503(B) and Fed. R. Bankr. P. 3007 to Expunge Certain (A) Severance Claims and (B) Books and Records Claims Asserting Administrative Expenses which was filed on December 21, 2009 and contained an identical objection to the SDADS Claim (defined below).

Claims, (C) Duplicate Claims, (D) Pension and Benefit Claims, and (E) Transferred Workers' Compensation Claims, (II) Modify and Allow Certain Administrative Expense Severance Claims, and (III) Allow Certain Administrative Expense Severance Claims (the "Forty-Fifth Omnibus Objection"). In support of this Response, and in support of SDADS's July 13, 2009 proof of administrative expense claim and November 4, 2009 amended proof of administrative expense claim filed against the Debtors, SDADS respectfully states as follows:

#### I. <u>BACKGROUND</u>

#### A. SDADS's Business Relationship with the Debtors

- 1. On October 8 and 14, 2005, Delphi Corporation and certain of its affiliates (the "<u>Debtors</u>"), predecessors of the Reorganized Debtors, filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1330 (the "<u>Bankruptcy Code</u>"). On June 1, 2009, the Debtors sought approval of certain modifications to a plan of reorganization that was confirmed on January 25, 2009 (the "Modified Plan"). This Court entered an order approving the Modified Plan on July 30, 2009.
- 2. On October 6, 2009, the Debtors substantially consummated the Modified Plan and the Effective Date occurred.
- 3. On February 12, 2010, the Reorganized Debtors filed their Forty-Fifth Omnibus Objection.
- 4. The Debtors were in the business of, among other things, manufacturing certain automobile parts. SDADS (formally known as Shanghai Delphi Automotive Door Systems, a joint venture the Debtors arranged with Shanghai Automotive Industrial Corporation) supplied automotive parts to the Debtors and continued to supply the Debtors up and until the Debtors

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sold their Interiors and Closures Business (the "<u>Business</u>"), as well as their share of the joint venture described above, to Inteva Products, LLC on or about March 1, 2008. Upon the Debtors' sale of the Business, SDADS no longer supplied parts to the Debtors.

#### B. SDADS's Claim Against the Debtors

5. On July 13, 2009, SDADS filed a timely administrative expense claim against the Debtors, claim number 19139, in the amount of \$238,274.80 (the "Claim"). On November 4, 2009, SDADS filed an amended administrative expense claim against the Debtors, claim number 19994, in the same amount of \$238,274.80 (the "Amended Claim" and together with the Claim, the "SDADS Claim"). The Amended Claim is identical to the Claim but included additional backup documentation including copies of the invoices supporting the total amount of the SDADS Claim. Specifically, from October 2006 through February, 2008, SDADS provided goods and services to the Debtors in the total amount of \$238,274.80 that remains unpaid and is reflected in the supporting invoices. A list summarizing the invoices constituting the SDADS Claim along with copies of each invoice are attached to the Amended Claim which is attached hereto as Exhibit A.

#### C. The Objection to the SDADS Claim

6. On February 12, 2010, the Reorganized Debtors, filed the Forty-Fifth Omnibus Objection, objecting to the SDADS Claim. The Reorganized Debtors did not provide any evidence in support of their objection to the Claim. Rather, the Reorganized Debtors' sole basis for objecting to the SDADS Claim is that the SDADS Claim "assert[s] liabilities or dollar amounts that are not owing pursuant to the Reorganized Debtors' book and records." *See* Forty-Fifth Omnibus Objection at ¶ 18.

#### II. ARGUMENT

- 7. A timely-filed proof of claim "shall constitute prima facie evidence of the validity and amount of the claim." Fed. R. Bankr. P. 3001(f); see also In re Oneida Ltd., 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009) ("A proof of claim is prima facie evidence of the validity and amount of a claim, and the objector bears the initial burden of persuasion."). To prevail on an objection to a proof of claim, any party objecting to the claim "has the burden of putting forth evidence sufficient to negate the prima facie validity of the claim by refuting one or more of the facts in the filed claim." In re St. Johnsbury Trucking Co., Inc., 206 B.R. 318, 323 (Bankr. S.D.N.Y. 1997); see also Oneida, 400 B.R. at 389 (finding that the burden only shifts to the claimant if the objector produces "evidence equal in force to the prima facie case...which, if believed, would refute at least one of the allegations that is essential to the claim's legal sufficiency) (quoting, In re Allegheny Intern., Inc., 954 F.2d 167, 173-174 (3d Cir. 1992)).
- 8. Here, the SDADS Claim is prima facie valid as it was timely filed and contains supporting documentation for the amounts included in the proof of claim. In contrast, the only evidence that the Reorganized Debtors have submitted in support of their objection to the SDADS Claim is the conclusory assertion that the SDADS Claim is not owed based on the Reorganized Debtors' books and records. The Reorganized Debtors' mere assertion that the SDADS Claim is subject to disallowance does not rebut the prima facie validity of the SDADS Claim. The Reorganized Debtors' objection to the SDADS Claim therefore should be disallowed with prejudice.<sup>2</sup>

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<sup>&</sup>lt;sup>2</sup> SDADS reserves the right to submit additional evidence in support of the SDADS Claim in the event that this matter proceeds to a contested hearing.

WHEREFORE, SDADS respectfully requests that this Court enter an Order: (i) allowing the SDADS Claim as an administrative expense against the Debtors in the amount of \$238,274.80; (ii) overruling the Reorganized Debtors' objection to the SDADS Claim and (iii) granting SDADS such other relief as this Court deems just and proper.

Dated: March 10, 2010 Respectfully submitted,

SHANGHAI INTEVA AUTOMOTIVE DOOR SYSTEMS COMPANY, LTD.

By: /s/ *Judy A. O'Neill*One of Its Attorneys

FOLEY & LARDNER LLP Judy A. O'Neill (admitted *pro hac vice*) Derek L. Wright 321 North Clark Street Suite 2800 Chicago, Illinois 60654

Telephone: (312) 832-4500 Facsimile: (312) 832-4700

## **EXHIBIT A**

United States Bankruptcy Court	Administrative	
Southern District of New York	Expense Claim	
Delphi Corporation et al. Claims Processing c/o Kurtzman Carson Consultants LLC, 2335 Alaska Avenue	Form	
El Segundo, California 90245		
Debtor against which claim is asserted: Delphi Corporation, et al. 05-44481	Case Name and Number In re Delphi Corporation., et al. 05-44481 Chapter 11, Jointly Administered	
NOTE: This form should not be used to make a claim in connection with a requite the Debtors prior to the commencement of the case. This Administrative Expendentials with a request for payment of an administrative expense arising after 1, 2009, pursuant to 13 U.S.C. § 503.	ense Claim Request form is to be used solely in	
Name of Creditor (The person or other entity to whom the debtor owes money or property)  SDADS (Shanghai Inteva Automotive Door Systems Company, Ltd.)  Name and Address Where Notices Should be Sent  Derek L. Wright, Esq., Foley & Lardner LLP  321 N. Clark Street, Suite 2800  Chicago, IL 60654  Telephone No.	Check box if you are aware that anyone clse has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.  Check box if you have never received any notices from the bankruptcy court in this case.  Check box if the address differs from the address on the envelope sent to you by the court.	
312-832-4500		THIS SPACE IS FOR COURT USE ONLY
ACCOUNT OR OTHER NUMBER BY WHICH CREDITOR IDENTIFIES DEBTOR.	Check here if this claim replaces  Xamends a previously file	cd claim, dated: 7/13/09
I. BASIS FOR CLAIM Goods sold Services performed Money loaned Personal injury/wrongful death Taxes XOther (Describe briefly) See Attached	Retiree benefits as defined in 11 U.S.C. § 1114. Wages, salaries, and compensation (Fill out believed) to be second to be second to be second to be second from to be second t	ow)
n See Attached	(date)	datc)
2. DATE DEBT WAS INCURRED See Attached	3. IF COURT JUDGMENT, DATE OBTAINED	:
4. TOTAL AMOUNT OF ADMINISTRATIVE CLAIM: \$ 238,274.80 Check this box if claim includes interest or other charges in addition to the princip	al amount of the claim. Attach itemized statement	of all additional charges.
5. Brief Description of Claim (attach any additional information):  See Attached		
6. CREDITS AND SETOFFS: The amount of all payments on this claim has been or of making this proof of claim. In filing this claim, claimant has deducted all amounts.	edited and deducted for the purpose ts that claimant owes to debtor.	THIS SPACE IS FOR COURT USE ONLY
<ol> <li>SUPPORTING DOCUMENTS: <u>Attach copies of supporting documents</u>, such as p itemized statements of running accounts, contracts, court judgments, or evidence of DOCUMENTS. If the documents are not available, explain. If the documents are Any attachment must be 8-1/2" by 11".</li> </ol>	romissory notes, purchase orders, invoices,	
<ol> <li>DATE-STAMPED COPY: To receive an acknowledgement of the filing of your clervelope and copy of this proof of claim.</li> </ol>	aim, enclose a stamped, self-addressed	
	nor or other person fattorney, if any) Wright el to Inteva as owner of SDADS)	

# Attachment to Amended Administrative Expense Claim Filed by Shanghai Inteva Automotive Door Systems Company, Ltd. ("SDADS" f/k/a Shanghai Delphi Automotive Door Systems)

#### **Basis for Claim**

This administrative expense claim of SDADS is based on various purchase order agreements between Delphi Corporation (the "Debtor") and SDADS. Pursuant to those purchase orders, the Debtor has unpaid invoices due SDADS for goods and services provided to the Debtor on a post-petition basis. A list of the amounts due, along with copies of the corresponding invoices, are attached hereto. The total amount of SDADS's administrative expense claim against the Debtor is \$238,274.80.

#### Reservation of Rights

SDADS reserves any and all rights it has or may have in law and in equity and any and all rights it has or may have under state and federal law. SDADS further reserves all rights to amend or supplement this proof of claim and to assert any and all additional claims it may have against the Debtor.

Doc Date	Invoice Amt./Amount Due (US\$)
CFS53274	-231,34
2006-10-30	3,561.28
2007-04-02	22,795.77
2007-04-02	2,934.00
2007-04-09	4,630.32
2007-04-16	2,934.00
2007-04-20	126,838.66
2007-04-20	4,401.00
2007-06-04	3,172.85
2007-07-19	2,129.04
2007-08-06	2,934.00
2007-08-13	2,934.00
2007-08-27	24,594.06
2008-01-21	8,241.16
2008-02-04	26,406.00
T-4-1-	238,274.80
	CFS53274 2006-10-30 2007-04-02 2007-04-02 2007-04-09 2007-04-16 2007-04-20 2007-04-20 2007-06-04 2007-07-19 2007-08-06 2007-08-13 2007-08-27 2008-01-21

Systems

Date:

2006-10-30

Invoice No.: SDAD00908

#### **INVOICE &PACKING LIST**

Ship To:

Delphi Automotive Interior Systems 200 Georgesville Rd, Columbus,

OH,43228

Attn: Steve Cecutti Tel: 1-614-275-5188/5152 Fax: 1-614-275-5180

Ship From:

Shanghai Delphi Automotive Door Systems Co., Ltd.

No.401, Mid Fu Te Rd, Waigaoqiao Free

Trade Zone 200131 P.R. China

Tel: 86 21 50462288 Fax: 86 21 50463640

Description	Qty			NW	GW	Unit Price	Ttl Amount
(China)	pcs	Plt	Ctn	(KG)	(KG)	(US\$)	(US\$)
Tailgate Cable 16873511 尾门拉索(左)	4,000	1		536,000	580	1.18340	4,733.60
Global Rear Compartment Actuator 16888781汽车门锁执行器	5,376	4		591.360	892	3.8300	20,590.08
Global Rear Compartment Actuator 16888782汽车门领执行器	6,720	5		739.200	1,116	4.4300	29,769.60
	16,096	10	-	1,868.560	2,588		55,093.28

Total Quantity(Pcs):

16,096

Total Package:

10 Pallets Cartons

Total Amount(US\$): 55,093.28 Net Weight(Kg): 1,866.560 Gross Weight(Kg) 2,588 Total Measurement(CBM): 13.449 Original Country: China

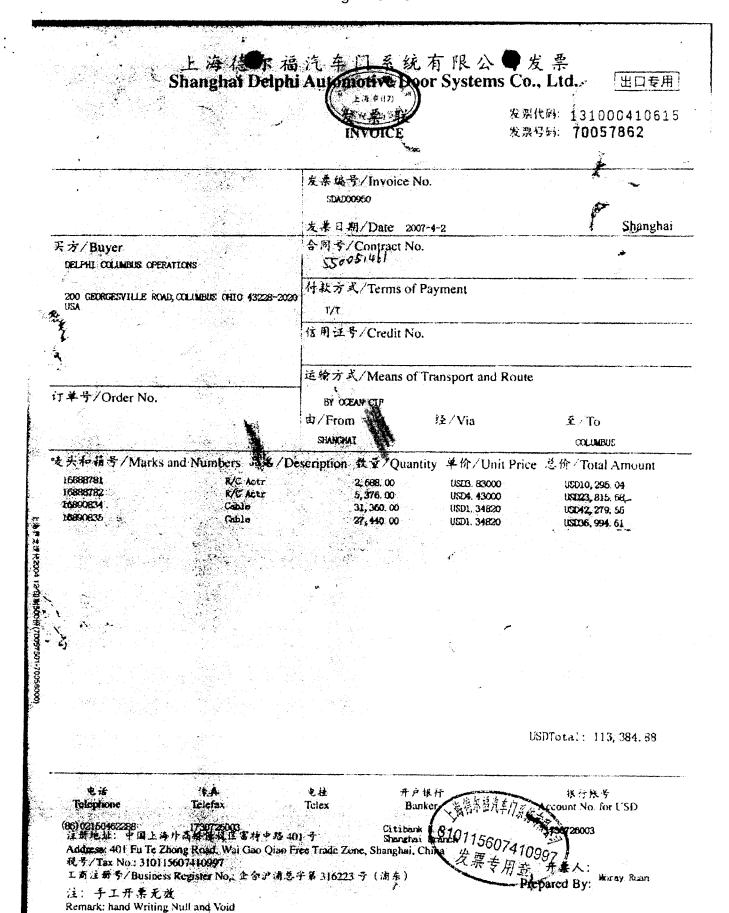
Term: CIF Payment Term: T/T Freight(US\$): 2,700 55

Insurance(us\$): Sail Date:

2006-10-30

Siganature And Stamp:

Date:



上海技术福汽车口系统有限公●发票 Shanghai Delphi Automotive Door Systems Co., Ltd.

发票代码: 131000410615 发票号码: 70057863

	发来编号/Tavoice No.	
NACE OF THE PROPERTY OF THE PR	* \$P\$(20065) 发表日期/Date 2007-4-2	Shanghai
表方/Beyer CELPHI COLUMBIS OPERATIONS	参門者/Contract No. SSEVS: Util	
200 GEORGESVILLE ROAD, COLUMBUS OHIO 43228-2020 USA	付款方式/Terms of Payment T/T	
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USDTotal: 2,934.00

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开户银行 Banker

银行帐号 Account No. for USD

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(86) 023 664 622 38 注射地址:中国上海北岛旅乐美国医科中路401 今。

Citibank N. Shangbai Bo Address: 401 Fu Te Zhong Road, Wai Guo Qiao Pree Trade Zone; Shanghai, Chin 化子/Tax No.: 310115607410997 上旬這最亏/Business Register No.: 全会产油是干燥 316323 号(湘水)

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发票代码: 131000410615 发票号码: 70057865

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14,400.00 36,000.00

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国上本外满路绿花区军村中从401 专

Address: 401 Fo Te Zhong Ruad, Wai Gao Qiao Free Trade Zone, Shanghai, Chir 优于/Tax No.: 310115607410997

工商运费卡/Business Register No.: 全合沙湾总字架 316223 号(浦东)

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(66)公15045236 日 上年外苏桥保建区窗科中路 401 号

Address: 401 Fu Te Zhong Road, Wai Gay Qiao Free Track Zone, Shanghai, Chini 元子/Tax No.: 310145607410997。 上海注册于/Business Register No.: 全会产出三字第316223号(清片)

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Prepared By:

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四上海外岛特殊战区多洲中共 401 辛

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发票代码: 131000410615 发票号码: 70057870

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Striker Spacer

54,000.00

USDTotal: 4,401.00

电话 Telephone

传真 Telefax

电接 Telex: 开户银行 Banker

85) 02150462288 注册地址:中国上海外高桥铁延运窗特中路 401 号

Citibank N. A. Address: 401 Fu Te Zhong Road, Wai Gao Qiao Free Trade Zone, Shanghai, China

优号/Tax No.: 310115607410997 -工商注册号/Business Register No.: 企合沪浦总字幕 316223 号(浦东)

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出口专用

发票代码: 131000410615 发票号码: 70057879

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USDTotal: 200, 690, 79

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C-12 Telex 升户银行 Banker

銀行帐号 Account No. for USD

1730726003

注册地址:中国土满外高桥保護里富州中亚 401 号

Address: 401 Fu Te Zhong Road, Wai Gao Qiao Free Trade Zone, Shanghai, it 1/Tax No.: 310115607410507

工商注册号/Business Register No.: 全合沪浦总字第 316223 号(浦东

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银行帐号 Account No. for USD

注册地址: 中国上海介高桥深风窗井中珍 401 号 Cibibank (Chi Co., Ltd sh.)
Address: 401 Fu Tc Zhong Road, Wai Guo Qiao Free Trude Zone, Shanghai, China 便子/Tax No.: 310115607410907: Cibibank (China) Co., Ltd sh

工商注册号/Business Register No. 企合沪浦总字第 316223 号(消床)

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1730726003 Michael

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**DELPHI** 

Systems

2007-8-6

Invoice No.: SDAD00988

#### **INVOICE & PACKING LIST**

Ship To:

Delphi Automotive Interior System: 200 Georgesville Rd,Columbus, OH,43228

Systems

Attn; Steve Cecutti Tel: 1-614-275-5188/5152 Fax: 1-614-275-5180

Ship From:

Shanghai Delphi Automotive Door Systems Co., Ltd.

No.401, Mid Fu Te Rd, Waigaoqiao Free

Trade Zone 200131 P.R. China

Tel: 86 21 50462288 Fax: 88 21 50463746

Description (Columbus)	Description	Qty		NW	GW	Unit Price	Ttl Amount
	(China)	pcs	Pit	(KG)	(KG)	(US\$)	(US\$)
Striker Spacer 16887818분)†	Striker Spacer 16887772 投片7772	36.000	2	1.026.000	1,101	0 0815	2.934.00
Total	Total	36,000	2	1,026.000	1,101		2,934.00

Total Quantity(Pcs): 36.000 Total Package: 2 pallets Total Amount(USS): 2.934.00 Net Weight(Kg): 1.026.000 Gross Weight(Kg) 1,101 Total Measurement(CBM): 0.528 Original Country: China Term: CIF Payment Term: T/T Freight(US\$) 60 Insurance(us5): 87 Sail Date: 2007-8-6

Siganature And Stamp:

**DELPHI** 

Systems

Date:

2007-8-13

Invoice No.: SDAD00990

#### **INVOICE & PACKING LIST**

Ship To:

Delphi Automotive Interior System: 200 Georgesville Rd.Columbus,

Systems

OH.43228

Attn: Steve Cecutti Tel: 1-814-275-5188/5152 Fax. 1-614-275-5180

#### Ship From:

Shanghai Delphi Automotive Door Systems Co., Ltd.

No.401, Mid Fu Te Rd, Waigaoqiao Free

Trade Zone 200131 P.R. China

Tel: 86 21 50462288 Fax. 86 21 50463746

Description (Columbus)	Description	Qty		NW	GW	Unit Price	Ttl Amount
	(China)	pcs	Pit	(KG)	(KG)	(US\$)	(US\$)
Striker Spacer 16887535挂片	Striker Spacer 16887820	18,000	1	597.780	635	0.0815	1.467 00
Striker Spacer 16887818∯片	Striker Spacer 16887772 掛片7772	18,000	1	513 000	551	0 0815	1,457 00
Total	Total	35,000	2	1,110.780	1,186		2,934.00

Total Quantity(Pcs): 36,000 Total Package: 2 pallets Total Amount(US\$): 2,934.00 Net Weight(Kg): 1,110.780 Gross Weight(Kg) 1.186 Total Measurement(CBM): 0.528 Original Country: China Term: ÇIF Payment Term: T/T Freight(US\$): 60 Insurance(us\$): 87 Sail Date: 2007-8-13

Siganature And Stamp:

上海德尔福汽车口系统有限公司发票 Shanghai Delphi Augunotive Door Systems Co., Ltd.

发票代码: 131000410615 发票号码: 70057922

	发表编号/Invoice No.
	SDACOGOA
	X基早期/Date 2007-8-27 Shanghai
方/Buyer	全司考/Contract No.
DELPHI COLUMBUS OPERATIONS	550022271
200 CEGROPSVILLE ROAD, COLLARISE CHILD	付款方式/Terms of Payment
43228-2020-USA	
	信用证号/Credit No.
	连翰才太/Means of Transport and Route
「单乎/Order No	By Copan CIR
	可/From 经/Via 重/To
	Shortesta

生头和特号/Marks and Numbers 品名/Description 数量/Quantity 单价/Unit Price 总价/Total Amount

15887753 16887820

天方/Buyer

Lever Striker Spacer Striker Spacer 14,400.00 306,000.00 162,000.00

0.11780 0.08150 0.08150 1,896.32 24, 939, 00 13, 203, 00

Total: 39,838,32

Telephone

开户银行 Bunker

银行帐号 Account No. for USD

注册地址:中国上海外高额保税区高待中路 401 号

Cibibank (China) Co., Ltd sh.

1730726003

Address: 401 Fu To Zhong Road, Wai Gao Qiao Free Trade Zone, Shanghair Chinai 记子/Tax No.: 310115607410997 上百注册号/Business Register No.: 全合产油总字 \$ 316223 号 (清本)

注:于工开幕无政 Remark: hand Writing Null and Void

310115607410997 Prepared By: Nichael

Systems

Date:

2008-1-21

Invoice No.: O-SDADS0001

#### **INVOICE & PACKING LIST**

Ship To:

Ship From:

DELPHI T& I ORION

Orion Cockpit Assembly 4872 S .Lapeer Road

ORION MI 48360 UNITED STATES

Attn:Kelley,Kevin

Phone :+1 248-655-8820 Fax : +1 866-746-9161 Shanghai Delphi Automotive Door Systems Co., Ltd.

No.401, Mid Fu Te Rd, Waigaoqiao Free

Trade Zone 200131 P.R. China

Tel: 86 21 50462288 Fax: 86 21 50463746

Description	Description Qty NW GW		GW	Unit Price	Ttl Amount	
2000//pii/0//	pcs Plt (KG) (KG)	(KG)	(US\$)	(US\$)		
Striker Spacer 16887820 垫片7820	108.000	6	3,587.000	3,813	0.0815	8,802.00
Striker Spacer 16887772 垫片7772	216,000	12	6,156.000	6,609	0.0815	17,604.00
Total	324,000	18	9,743.000	10,422		26,406.00

Total Quantity(Pcs):

324,000

Total Package:

18 pallets

Total Amount(U\$\$):

26.406.00

Net Weight(Kg):

9,743.000

Gross Weight(Kg)

10,422 4.752

Total Measurement(CBM): Original Country:

China

Term:

CIF

Payment Term:,

T/T

Freight(US\$);

800

Insurance(us\$):

520

Sail Date:

2008-1-21

Siganature And Stamp:

Date:

Systems

Date:

2008-2-4

Invoice No.: CMM-SDADS0017

**INVOICE & PACKING LIST** 

Ship To:

Delphi 1 CISCO 39701 DCMM Brownsville Warehouse, 3301 Nafta Parkway, Brownsville, TX, 78521,USA

Contact:Raul Velazquez Tel: 1-956-228-1818 Ship From:

Shanghai Delphi Automotive Door Systems Co., Ltd.

No.401, Mid Fu Te Rd, Waigaoqiac Free

Trade Zone 200131 P.R. China

Tel: 86 21 50462288

Description (China)	Otty			w	GW	Unit Price	Tti Amount
	pcs	Plt	Ctn	(KG)	(KG)	(US\$)	(US\$)
Tailgate Cable PU 900 16890834 港门拉集(右)900	15,680	4		2,210,880	2,430	1 3482	21,139.78
Tailgate Cable PU 900 16890835 程行程(按)900	15,580	4		2,210.880	2,430	1 3482	21.139.78
Tailgate Cable UUV 900 16890832 尾门拉索(右)900	3,920	1		560 560	615	1.3657	5,353 54
Tailgate Cable UUV 900 16890833 餐门投業(版)900	3,920	,		560.560	615	1.3657	5,353.54
Slobal Rear Compartment Actuator 16890861代作门领执行器	18,816	14		2,069.760	3,123	3 8750	72 930 82
Global Rear Compartment Actuator 6890862汽车门铁执行器	8,064	5		887 040	1,341	4 4760	36,094 46
TOTAL	66,080	30		8,499.680	10,554		162,011,92

Total Quantity(Pcs)	66,080		
Total Package:	3C Pallets		Cartons
Total Amount(US\$):	162,011.92	•	Canons
Net Weight(Kg):	8,499,680		
Gross Weight(Kg)	10.554		
Total Measurement(CBM):	37.588		
Original Country:	China		
Term;	CIF		
Payment Term:	Τ/Τ		
Freight(US\$):	4.000		
Insurance(us\$):	4.101		
Sail Date:	2008-2-4		

Siganature And Stamp:

Date:

#### FOLEY & LARDNER LLP

JUDY A. O'NEILL (admitted *pro hac vice*) DEREK L. WRIGHT 321 N. Clark Street, Suite 2800 Chicago, IL 60654-5313

Telephone: 312.832.4500 Facsimile: 312.832.4700 joneill@foley.com dlwright@foley.com

Attorneys for Shanghai Inteva Automotive Door Systems Company, Ltd.

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:	)	Chapter 11
	)	-
DPH HOLDINGS CORP., et al.,	)	Case No. 05-44481 (RDD)
Reorganized Debtors.	)	(Jointly Administered)
reorganized Decicies.	, )	(vointry rammistered)

#### **CERTIFICATE OF SERVICE**

I hereby certify that on March 10, 2010, I caused to be electronically filed with the United States Bankruptcy Court for the Southern District of New York, the SHANGHAI INTEVA AUTOMOTIVE DOOR SYSTEMS COMPANY, LTD.'S RESPONSE TO REORGANIZED DEBTORS' FORTY-FIFTH OMNIBUS OBJECTION PURSUANT TO 11 U.S.C. § 503(B) AND FED. R. BANKR. P. 3007 TO (I) EXPUNGE CERTAIN ADMINISTRATIVE EXPENSE (A) SEVERANCE CLAIMS, (B) BOOKS AND RECORDS CLAIMS, (C) DUPLICATE CLAIMS, (D) PENSION AND BENEFIT CLAIMS, AND (E) TRANSFERRED WORKERS' COMPENSATION CLAIMS, (II) MODIFY AND ALLOW CERTAIN ADMINISTRATIVE EXPENSE SEVERANCE CLAIMS, and (III) ALLOW CERTAIN ADMINISTRATIVE EXPENSE SEVERANCE CLAIMS, using the ECF system which will send notification of such filing to registered users in the case and caused to be served via overnight delivery on the following at the addresses set forth below:

Honorable Robert D. Drain
United States Bankruptcy Judge
United States Bankruptcy Court for the
Southern District of New York
The Hon. Charles L. Brieant Jr. Federal Building
and Courthouse
300 Quarropas Street
Courtroom 118
White Plains, NY 10601-4140

DPH Holdings Corp. 5725 Delphi Drive Troy, Michigan 48098 Att'n: President 05-44481-rdd Doc 19627 Filed 03/10/10 Entered 03/10/10 18:32:26 Main Document Pg 25 of 25

Counsel to the Reorganized Debtors Skadden, Arps, Slate, Meagher & Flom LLP 155 NorthWacker Drive Chicago, Illinois 60606 Att'n: John Wm. Butler, Jr. John K. Lyons Joseph N. Wharton

SHANGHAI INTEVA AUTOMOTIVE DOOR SYSTEMS COMPANY, LTD.

By: /s/ Judy A. O'Neill
One of Its Attorneys

FOLEY & LARDNER LLP Judy A. O'Neill Derek L. Wright 321 North Clark Street Suite 2800 Chicago, Illinois 60654

Telephone: (312) 832-4500 Facsimile: (312) 832-4700